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To Jim Christiansen/EPR/R8/USEPA/US@EPA
cc
Subject Re Libby RI rationale

03/14/02 04 06 PM

Sorry so late Our schedule has been full for residential sampling

In the design of the RI approach- be sure to include building materials with vermiculite as aggregate We have noted houses and commercial properties which fit into this category This should also be included in the Qualitative/Visual Information

Proposed CSS Steps-

Primary Source- should this include soils tested a 1% or > since this falls into the category of ACM according to the existing regulations

Possible outcomes of CSS-

The question of Is it cheaper/more efficient/more protective

During our latest round of sampling(300 Homes), we have been analyzing dust samples that were collected in homes which do not have ZAI or building material with zonolite as aggregate indoors The majority of the homes that fall into this category have some type of contamination in the garden/yard/flowerbed Our results should give you a representative assessment of whether homes that have a primary or secondary source causes contamination in the home This will take some time to pull the data together (soil results compared to dust results of properties that fall into this category)

Looks like a good approach Keep in touch

GP

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>>> <Christiansen Jim@epamail.epa.gov> 03/07/02 16 31 PM >>>

Hey folks Attached are a couple documents that go together which describe the thought process for the remedial investigation (RI) sampling approach I've discussed to some degree with all of you This isn't a stand alone document or meant to be any kind of final product, it's just a summary meant to solicit input and suggestions prior to CDM moving forward with a SAP I wrote a brief lead in/explanation, then laid out specific screening steps, then possible scenarios we may encounter & decision points (both written and graphical) Many of the details in this document are glossed over, that doesn't mean we haven't considered them, it means we are still working on them or they weren't important for this There is also plenty of judgement that goes into these questions which isn't reflected here, but I understand the complexity (I've also made the assumption that we will address ZAI) My intent is for everyone to read this carefully, then let me know if the approach makes sense, any changes you suggest, and anything to look for as we get into details (such as sampling and analysis details) I don't need wording or grammatical review unless its something that

affects substance, but I do need everyone to think carefully and understand this as it will shape the direction we go on Libby permanently, to the tune of over 3000 properties Tight schedule - please get me any comments or call me by March 19 Once we move past the conceptual, I need everyone to start thinking critically about their particular piece of the pie and how it will need to be modified to fit the approach

Send this to whom you need to get meaningful input, but please don't circulate it too much or let anyone get overly worked up - it is only a conceptual draft If you can't open something, call me and I'll fax it Call if you need clarification Contractors - if you are going to spend a little time on this, check with who you have to - consider this a request, not a direction Thanks Jim

(See attached file LibbyCSSscreeningsteps wpd) (See attached file CSSScreengraphical PRZ)